

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

DECLARATION OF ALISA COLEMAN

I, Alisa Coleman, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Chief Operating Officer of ABKCO Music, Inc. (“ABKCO”). I joined ABKCO in 1985 and I have held various positions throughout my 38-year career at ABKCO, including my current position. As COO, I look after many aspects of ABKCO’s business, but my primary responsibility is overseeing and managing the licensing of our musical compositions, including licenses involving lyrics. Outside of my role at ABKCO, I have held positions at various music publishing associations and societies, including acting as President of the Association of Independent Music Publishers (“AIMP”), serving as a member of the Board of Review at the American Society of Composers, Authors and Publishers (“ASCAP”), and most recently serving as Chair of the Board of Directors at the Mechanical Licensing Collective (“MLC”), which is headquartered in Nashville.

2. I submit this Declaration on behalf of Plaintiff ABKCO in support of Plaintiffs’ Opposition to Anthropic’s Motion to Dismiss or Transfer.

3. I have personal knowledge of the information contained in this Declaration through my employment with ABKCO and based on my review of the documents and websites referenced below. If called upon as a witness, I could and would testify competently to the information contained herein.

4. ABKCO is a leading independent music publisher. ABKCO was founded in the late 1950s and is one of the last remaining family-owned and operated music publishing companies. It owns and/or controls exclusive rights with respect to copyrighted musical compositions written by Sam Cooke, Mick Jagger and Keith Richards (of The Rolling Stones), Ray and Dave Davies (of The Kinks), Bobby Womack, and Rudy Martinez (of Question Mark & The Mysterians), among many others. ABKCO's copyrights in these compositions protect both their lyrics and the underlying melodies, harmonies, and rhythms.

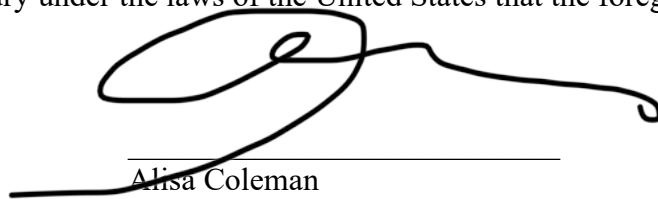
5. As Chief Operating Officer, I am generally familiar with the location of ABKCO's offices and distribution of its employees nationally. ABKCO is a New York corporation with a principal place of business in New York, New York.

6. ABKCO represents Tennessee-based songwriters, namely, Pat Luboff and the Norman Luboff estate.

7. If this lawsuit is transferred to San Francisco, it will impose a significant financial and time burden on ABKCO that would not otherwise be incurred if the lawsuit remained in Nashville. I travel to Nashville frequently in the course of my duties as the MLC Chair of the Board of Directors, which is headquartered in Nashville. I have also traveled to Nashville in the course of my role with ABKCO. I have never traveled to San Francisco in connection with my work at ABKCO. If ABKCO employees, myself included, are required to travel to California to act as witnesses or company representatives in this litigation, ABKCO will incur considerably

higher costs and inconvenience than if the case remained in Nashville. Specifically, ABKCO and its employees would incur higher costs for its employees' transportation and lodging than it would if this case proceeded in Tennessee. Moreover, a nonstop flight from New York City to San Francisco is about four hours longer than the flight from New York City to Nashville, which would make travel to the Northern District of California significantly more disruptive for me and for other New York-based ABKCO employees.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Alisa Coleman

Executed this 22nd day of January, 2024 in New York, NY.

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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